

AUG 24 2006

Serial No. 10/696,295
Response Filed With RCE

Docket No. 85804-010801

REMARKS

Claims 1 to 28 and 31 to 33 are pending, of which Claims 1, 11, 16 and 24 are independent. Reconsideration and further examination are respectfully requested.

Before turning to the Office Action, and by way of a non-limiting example of one application of the claimed invention, a brief background discussion of an industry that has arisen focused on serving ads on the Internet is provided. Such industry includes marketers or advertisers, which typically are the source of the advertising content, ad agencies, which typically undertake planning, creating, executing and tracking ad campaigns on behalf of their clients, and web publishers, which typically operate one or more websites and sell ad space on such sites. The tracking of ads and ad campaigns generally involves monitoring the effectiveness of each ad, for example, by the number of times the ad is viewed by a users (often referred to as a "page view"), the number of times a user activates a link in the ad to the advertiser's web page (often referred to as a "click-through"), the number of times a user makes a purchase after activating a link in the ad (often referred to as an "acquisition").

In general, the entity providing, or "serving", the ads receives the advertising content from the advertisers or agencies and a staff of programmers employed by the ad-serving entity must manually incorporate the advertising content into the ad tracking code. These programmers must not only incorporate the received ad content into the ad code to be served, but also must effectuate changes to the ad content received from the advertiser or agency. Such work is labor intensive and results in both decreased profits for the entities serving the ads and, to the extent the cost is not completely absorbed by the entity serving the ad, increased advertising costs to the advertiser and/or agency.

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In accordance with aspects of the claimed invention, an integrated ad file, which is served to a computer to provide the ad, is created by combining an ad input file, which identifies ad content, with a conduit file, which identifies ad tracking code. Among the advantages of this arrangement, an advertiser may provide the content to any number of different ad-serving entities without concerning itself with the ad tracking methodologies that are to be used with the content. Similarly, a tracking methodology can be selected and implemented independent of the ad content. On one hand, advertisers may modify the ad content without implicating changes to the tracking code, and on the other hand, modifications can be made to the tracking methodology and code without implicating changes to the ad content.

By way of non-limiting example, reference is respectfully made to Figure 5 and the description commencing at paragraph 36, which illustrate a process in which an ad file and a conduit file are combined to form a single, integrated file, which identifies ad content and tracking data for the ad. The integrated file can be transmitted to a client computer to serve the ad, and track user ad interaction, for example. Figure 6 provides an example of a portion of an ad input file and Figure 7 provides an example of a portion of a conduit file. A discussion of these figures can be found commencing at paragraphs 41 and 43, respectively, of the originally-filed Application. Figures 8 and 9, which are discussed commencing at paragraph 59 of the Application, provide an example of portions of an integrated ad file, which includes contents from the ad input file and the conduit file. It should be apparent that discussion of portions of the present Application herein is intended for purposes of illustration only, and is not intended to limit the scope of the claimed invention.

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By the Office Action, Claims 1 to 28 and 31 to 33 are rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 5,740,549 (Reilly). The § 103(a) is believed to be both legally and factually deficient. Reconsideration and withdrawal of the rejection are therefore respectfully requested.

Claim 1 recites a method for providing an ad via a computer network. According to the method, an ad input file is combined with a conduit file to create an integrated ad file containing computer code for providing the ad. The ad input file identifies the content of the ad and the conduit file identifies tracking data for the ad. The integrated ad file is served from a computer to provide the ad.

Reilly describes a system by which an information server periodically updates a user's computer so that the user computer has the current news items, advertisements and screen saver and viewer procedures, and a user's computer generates a display screen to display the news items and advertisements at the user's computer. To optimize a connection between the user computer and the information server, the items that are to be transmitted to the user computer are identified before making the connection, and the identified items are downloaded to the user computer during the same connection. A compression mechanism can be used to compress the data items for transmission to the user computer.

The Office Action concedes that Reilly fails to disclose combining an ad file and a conduit file. It follows then that Reilly also fails to disclose combining an ad file and a conduit file to create an integrated ad file containing ad content and ad tracking data.

In an attempt to remedy the admitted deficiency(ies) in the stated grounds for rejection and applied reference (i.e., Reilly), the Office Action refers to network data transmissions and

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hierarchical file systems. It is unclear how these concepts relate to the specific elements claimed, since the reference by official notice to this general area of the art seems to be presented solely in order to suit the conclusions reached in the Office Action. The mere fact that network data transmission and hierarchical file systems are well known concepts does not in any way support a teaching for creating a new type of ad file as claimed. The fact is that none of the claim elements are taught by the disclosure provided by Reilly, nor by the concepts adopted by the Examiner in the Office Action as being well known. Reilly, either alone or in a hypothetical combination suggested in the Office Action (if such combination is even permissible, a point which is in no way conceded), fails to teach, suggest or disclose the claimed integrated ad file, let alone combining an ad input file and a conduit file to create the claimed integrated ad file.

With regard to network transmissions, the Office Action states (at page 3) that:

“[i]t is well known to combine [data objects] into a single transmission file (package) for transmission over a network.”

The Office Action fails to articulate what is meant by “single transmission file (package).” In fact, a search of Reilly failed to locate any “transmission file (package)”, “transmission file” or “transmission package” terminology referred to in the Office Action. Applicants respectfully request that the Examiner provide clarification as to what is meant by the terminology used in the Office Action. Furthermore, should the grounds for rejection be maintained, Applicants respectfully request the Examiner to provide support for the assertion that it is well known to combine data objects into a single transmission file, and how, even if this were the case, this teaches the creation of an integrated ad file containing an ad file and a conduit file.

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Reilly simply describes using a single network connection to a user computer to download multiple discrete items to a user computer. None of the discrete items identified in Reilly, i.e., advertisement images, scripts, and software upgrades, are in any way related to the claimed integrated ad file. Reilly describes using a single network connection with the user computer to download discrete items. Downloading multiple discrete items cannot be said to be the same as creating an integrated ad file by combining an ad input file and a conduit file.

Similarly, a hierarchical file system which contains folders and files within a folder cannot be said to be the same as the claimed integrated ad file. Furthermore, a hierarchical file system certainly cannot be said to teach, suggest or disclose creating an integrated ad file, and/or creating an integrated ad file by combining an ad file identifying ad content and a conduit file identifying tracking data.

The Office Action also cites the Microsoft Press Computer Dictionary's (hereinafter also referred to as the "Computer Dictionary") definition of a folder, and states (at page 6):

"[w]hile the Applicant is calling [the integrated ad file] a file, it is better known in the hierarchical files [sic] system art as a folder, which is 'a means of organizing programs and documents on a disk and can hold both files and additional folders' (Microsoft Press Computer Dictionary, Third Edition, pages 202-203). A folder, along with the files it contains, may be directly transmitted over networks or may be attached to another transmission means, such as an e-mail message. Thus, Reilly's disclosure of simultaneously sending a plurality of files over the network to the user's computer and his disclosure of using compression to decrease the transmission time would have suggested to one having even rudimentary skill in the art placing [sic] separate files in one folder (integrated ad file) and compressing it (such as generating a .zip file) to form a transmission file prior to the transmission."

Even assuming, *arguendo*, that a folder is the same as an integrated file (a point which is in no way conceded), nothing in Reilly or in the Computer Dictionary teaches, suggests or discloses a "folder" containing ad content and ad tracking data, let alone a "folder" created by

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combining an ad input file which identifies ad content and a conduit file which identifies ad tracking data. Accordingly, a folder cannot be said to be the same as the claimed integrated ad file. Nothing in the definition of a folder found in Microsoft's Dictionary, and indeed nothing in Reilly, teaches, suggests or discloses a folder in a file system being the same as an integrated file, let alone an integrated ad file containing computer code for providing an ad, the integrated ad file being created by combining an ad input file which identifies the content of the ad and a conduit file which identifies tracking data for the ad.

With respect to compression, at col. 8, lines 50 to 53, Reilly states that software modules and images, i.e., advertisement images, can be compressed using well known data compression technologies for efficient transmission. The cited portion of Reilly simply describes that an image can be compressed to reduce the size of the image, or that a software module can be compressed to reduce the size of the software module. However, use of a compression scheme to reduce the size of a discrete item is clearly not the same as creating an integrated ad file by combining an ad input file that identifies content of the ad with a conduit file that identifies tracking data for the ad to create an integrated ad file. Nothing in the cited portion of Reilly describes such an integrated ad file which further contains computer code for providing the ad.

The Office Action mentions using a compression utility such as a zip compression utility and the zip file that is created by such a utility. A zip file is not the claimed integrated ad file. Nothing in Reilly, teaches, suggests or discloses that a zip file the same as an integrated file containing computer code for providing an ad, the integrated ad file being created by combining an ad input file which identifies the content of the ad and a conduit file which identifies tracking data for the ad.

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Should the Examiner persist in this rejection of Claim 1 on these grounds, the Examiner is respectfully requested to specifically point out by drawing, reference number and paragraph citation the specific elements of Reilly that the Examiner equates to an integrated ad file which includes computer code for providing an ad and which is created by combining an ad input file identifying the content of the ad with a conduit file identifying tracking data for the ad. See MPEP § 706.02(j). Such new grounds for rejection should be made non-final.

In response to Applicants' previous remarks concerning the lack of support for the stated motivation to make the combination suggested in the Office Action, the Office Action cites In re McLaughlin, 443 F.2d 1393 (CCPA 1971) and states (at page 7):

"[i]t must be recognized that any judgment on obviousness is in a sense necessarily a reconstruction based upon hindsight reasoning. But so long as it takes into account only knowledge which was within the level of ordinary skill at the time the claimed invention was made, and does not include knowledge gleaned only from the applicant's disclosure, such reconstruction is proper."

It is respectfully submitted that the interpretation of McLaughlin as standing for the principle that all obviousness rejections "in a sense necessarily" require a reconstruction based upon hindsight reasoning is not altogether accurate. The principles of McLaughlin require that the Examiner place himself in the shoes of a person of ordinary skill in the art at the time the invention was made. See In re McLaughlin, 443 F.2d 1392 (CCPA 1971). It is this hindsight to which the McLaughlin case refers, which hindsight, in the context of McLaughlin, limits the Examiner only to that which was known to the person of ordinary skill at the pertinent time to which the rejection applies. As the Courts have amply set forth subsequent to McLaughlin, the Applicants' invention may not be used as the hindsight roadmap with which the Examiner winds his way through the prior art for identifying features and then, using the teachings of the claimed invention, "use that which the inventor has taught against its teacher" to provide the missing

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motivation to combine the references to yield the claimed invention. In re Lee, 277 F.3d 1338, 1344, citing W.L. Gore v. Garlock, Inc., 721 F.2d 1540, 1553 (Fed. Cir. 1993). As the Federal Circuit stated in In re Dembiczak, 175 F.3d 994, 999 (Fed. Cir. 1999);

Our case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references. See e.g., C.R. Bard, Inc. v. M3 Sys., 157 F.3d 1340, 1352, 48 USPQ2d 1225, 1232 (Fed. Cir. 1998) (describing "teaching or suggestion or motivation [to combine]" as an "essential evidentiary component of an obviousness holding"); In re Rouffer, 149 F.3d 1350, 1359, 47 USPQ2d 1453, 1459 (Fed. Cir. 1998) ("the Board must identify specifically...the reasons one of ordinary skill in the art would have been motivated to select the references and combine them"); In re Fritch, 972 F.2d 1260, 1265, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992) (examiner can satisfy burden of obviousness in light of combination "only by showing some objective teaching [leading to the combination]"); In re Fine, 837 F.2d 1071, 1075, 5 USPQ2d 1596, 1600 (Fed. Cir. 1998) (evidence of teaching or suggestion "essential" to avoid hindsight)...Combining prior art references without evidence of such a suggestion, teaching or motivation simply takes the inventor's disclosure as a blueprint for piecing together the prior art to defeat patentability – the essence of hindsight. See e.g., Interconnect Planning Corp., v. Feil, 774 F.2d 1132, 1138, 227 USPQ 543, 547 (Fed. Cir. 1985) ("The invention must be viewed not with the blueprint drawn by the inventor, but in the state of the art that existed at the time.")

There is no showing of any support in the Office Action for the stated motivation to combine the common knowledge assertions (which assertions are themselves improper, for at least the reason that there has been no references cited to support such assertions) with the teachings of Reilly. Without such a showing in the prior art, it can only be said that the disclosure of the present application is being used as a blueprint to modify the teachings of Reilly to reject the claims of the present invention.

In view of the above, it is submitted that the Office Action uses Applicant's own disclosure to provide the otherwise missing motivation to modify Reilly to yield the claimed invention, which is not permitted, as clearly stated by the courts in the case law discussed above.

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The Office Action fails to make the evidential showing required to establish a prima facie case of obviousness under 35 U.S.C. § 103(a).

Based on the factual and legal deficiencies noted above, reconsideration and withdrawal of the 35 U.S.C. § 103(a) are respectfully requested. The applied art, namely Reilly, either alone or in combination (n.b., such combination is not believed to be permissible, as discussed above) is not seen to teach, suggest or disclose each and every one of the features recited in Claim 1. Reconsideration and withdrawal of the rejection of Claim 1 are therefore respectfully requested.

Claim 11 recites a method of facilitating providing an ad by loading an ad file. According to the method, first and second files are identified. A placeholder is identified in the first file, and the second file is electronically inserted into the placeholder to create the ad file. The ad file includes computer code for providing the ad.

The Office Action states (at pages 7 and 8) that:

"[t]he Examiner notes that Reilly discloses display scripts which control which part of the screen will display the new [sic] items and which part will display the advertisements (col. 9, line 65 - col. 10, line 18), and describes [at col. 13, lines 61-64] that '[a] portion of the data view screen is always occupied by an advertisement image 258' Reilly further discloses that the news items, the advertisements, and the display scripts are all downloaded at the same time. The Examiner considers the portion of the display script which identifies the location on the display screen where the advertisement is to be inserted as the equivalent of the claimed 'placeholder'."

A display screen is not the same as a file, a location on a display screen is not the same as a location in a file, a script (or any portion thereof) that identifies the display screen location at which an advertisement or a news item is displayed is not the same as placeholder in a file. A script (or any portion thereof) which controls the display of a display screen cannot be said to be

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the same as a placeholder in a file, let alone creating an ad file by electronically inserting a second file into the placeholder identified in the first file.

The applied art, namely Reilly, either alone or in any hypothetical combination (if such combination is even permissible, a point which is in no way conceded) cannot be said to teach, suggest or disclose each and every one of the features recited in Claim 11. Reilly cannot form the basis of a 35 U.S.C. § 103(a) rejection, and withdrawal of the § 103(a) rejection of Claim 11 is respectfully requested. For at least the same reasons, the § 103(a) rejection of Claims 16 and 24 should be withdrawn.

The other claims are each dependent from the independent claims discussed above and are therefore believed patentable for the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In this regard, Claims 2 and 3 (both of which depend from Claim 1) recite the additional element of creating a modified integrated ad file. In accordance with Claim 2, the modified integrated ad file is created by combining the conduit file with a modified ad input file representing a change to the content of the ad with the conduit, and in accordance with Claim 3 the modified integrated ad file is created by combining the ad input file with a modified conduit file representing a change to the tracking data.

Advantageously and by virtue of the claimed elements, by way of non-limiting example, changes in ad content can thereby be made without implicating changes to the tracking code, and on the other hand, modifications can be made to the tracking methodology and code without implicating changes to the ad content.

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Nothing in Reilly can be said to teach, suggest or disclose creating a modified integrated ad file. The portions of Reilly cited in the Office Action (i.e., col. 5, line 47 to col. 6, line 10 and col. 8, lines 24 to 31) describe upgrading a user's computer by downloading one or more discrete data objects to the user computer. While Reilly describes that a data object downloaded to the user's computer can replace a data object previously stored on the user's computer, replacing one data object with another data object in storage on a user computer cannot be said to be the same as creating a modified integrated ad file, by combining a modified ad input file representing a change to the content of an ad with a conduit file (Claim 2), or by combining a modified conduit file representing a change to the tracking data with an ad input file (Claim 3).

Accordingly, since Reilly fails to teach, suggest or disclose multiple elements of Claims 2 and 3, these claims should be patentable over Reilly. Claims 13 and 14 (both of which depend from Claim 11), and Claims 22 and 23 (which depend from Claim 16) are believed to be patentable over Reilly for at least the same reasons.

Claim 31, depends from Claim 24, and recites that the integrated ad file includes one or more exit codes referring to one or more URL variables. Claim 32, which depends from Claim 31, further recites that the integrated ad file is designed to be loaded by code, the code specifying one or more URLs corresponding to the one or more URL variables referred to by the one or more exit codes included in the integrated ad file, the code populating the one or more URL variables with the one or more URLs.

In rejecting Claims 31 and 32, the Office Action relies on col. 13, lines 3 to 25 of Reilly. However, the cited portion of Reilly describes a screen saver procedure, which displays a news item and advertisement as a screen saver. The screen saver procedure is exited by the user

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clicking on the news item of the advertisement. If the user clicks on the advertisement, the user's computer is connected to an associated web page that provides additional information from the advertiser. A user exiting a screen saver procedure by clicking on a portion of a display screen, or a connection being made to a web page as part of exiting a screen saver procedure clearly cannot be said to be the same as the claimed integrated ad file including exit codes referring to URL variables, code used to load the claimed integrated ad file specifying one or more URLs corresponding to the one or more URL variables referred to by the one or more exit codes included in the integrated ad file, and populating the one or more URL variables with the one or more URLs specified by the code. Accordingly and for at least these reasons, Claims 31 and 32 are believed to be patentable over Reilly.

Claim 33 depends from Claim 1 and is rejected on the same basis as Claim 1. Claim 33 is believed to be patentable over Reilly, since nothing in the cited portions of Reilly can be said to teach, suggest or disclose the elements of Claim 1 or the additional elements of Claim 33, i.e., that the ad is provided to a user computer via the Internet and the combining of the files to create the claimed integrated ad file is in response to receiving a request for a Web page, the serving of the claimed integrated ad file includes providing the ad as part of the requested Web page.

Claim 12, which depends from Claim 11 and is rejected on the same basis as Claim 11, is believed to be patentable over Reilly, since nothing in the cited portions of Reilly can be said to teach, suggest or disclose the elements of Claim 11 or the additional elements of Claim 12, including electronically inserting a second file containing ad-tracking code into a placeholder identified in a first file which specifies ad content code to create an ad file, the ad file including computer code for providing the ad.

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Claim 9 is rejected on the same basis as Claims 31 and 32, i.e., col. 13, lines 3 to 25 of Reilly. The screen saver procedure of Reilly discussed above, however, cannot be said to teach, suggest or disclose the elements of serving the claimed integrated ad file including html code loading a JavaScript file, the html code including a variable and the JavaScript file including code that determines whether the ad opens in a parent window or a new window based on the variable. Accordingly and for at least these reasons, Claim 9 is believed to be patentable over Reilly.

Claim 10 recites that serving the integrated ad file includes html code loading the integrated ad file, the html code including a tracking identifier, the method further comprising tracking the ad using code in the conduit file and the tracking identifier.

The Office Action rejects Claim 10 over Reilly and cites col. 9, lines 18 to 33 and col. 11, lines 64 to 66 as allegedly disclosing the recited elements. The cited portions of Reilly describe a display statistics generator on the user computer which keeps track of how many times each advertisement or news items, which information is then uploaded to the server. A display statistics generator which keeps track of how many times each advertisement or news items is displayed on the user computer cannot be said to be the same as serving the claimed integrated ad file by html loading the integrated ad file, the html code including a tracking identifier used with code in the conduit file to track the ad. Apart from the discussion of the display statistics generator found at col. 9, lines 18 to 33, Reilly states at col. 11, lines 64 to 66, that news items, advertisements and display scripts are assigned unique file names. Assigning a unique file name to a file cannot be said to be the same as serving the claimed integrated ad file by html loading

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the integrated ad file, the html code including a tracking identifier used with code in the conduit file to track the ad.

Claims 7 and 8 recite, inter alia, that serving the integrated ad file includes html code loading the integrated ad file. In accordance with Claim 7, the html code specifies URLs for one or more web pages linked to the ad by one or more actions that the ad includes. In accordance with Claim 8, the html code includes a variable, which is used by code included in the conduit file to determine whether the ad opens in a parent window or new window based on the variable. These claims are considered to be patentable over Reilly for at least the reasons discussed above with reference to Claims 31 and 32.

With respect to Claims 4 to 6, 15, 17, 26 and 27, the Office Action concedes that Reilly fails to disclose one or more of the claimed elements. However, in rejecting these claims, the Office Action improperly dissects the claimed invention into discrete elements and then contends that each of the elements in isolation are well known, or are the subject of "management decisions." It is respectfully submitted that such treatment of the claims is improper. Withdrawal of the rejection of these claims is respectfully requested.

More particularly, a respectful reminder is made of the provisions of MPEP § 2106 II. C, which state (in relevant part):

"when evaluating the scope of a claim, every limitation in the claimed invention in the claim must be considered. Office personnel may not dissect a claimed invention into discrete elements and then evaluate the elements in isolation. Instead, the claims as a whole must be considered."

The dependent claims of the present application each recite additional aspects of the claimed invention, such aspects including the interaction of the elements of the dependent claims with the elements of their base claims. It is therefore respectfully submitted that it is improper to

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dissect the invention recited in a dependent claim into discrete elements and then to evaluate the elements in isolation apart from their base claim(s).

Moreover, reference is respectfully made to MPEP § 2144.03 A, which states (in relevant part) that

"it would not be appropriate for the examiner to take official notice of facts without citing a prior art reference where the facts asserted to be well known are not capable of instant and unquestionable demonstration as being well-known."

In rejecting many of the dependent claims, the Office Action not only treats the elements recited therein in isolation, but also concludes that these elements so treated are well-known, with making a specific art reference. Accordingly, Applicants renew their request under MPEP § 2144.03 for documentary evidence in support of the "Official Notice" taken in the Office Action, if the rejection of these claims is maintained.

For at least the foregoing reasons, the grounds for rejection of the claims of the present application are believed to be both legally and factually deficient. Withdrawal of the § 103(a) rejection of the claims is therefore respectfully request.

In view of the foregoing, the claims of the present application are believed to be patentable over the applied art. Furthermore and in view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

The Applicant respectfully requests that a timely Notice of Allowance therefore be issued in this case. Should matters remain which the Examiner believes could be resolved in a further telephone interview, the Examiner is requested to telephone the Applicant's undersigned attorney.

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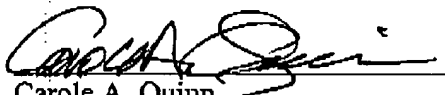
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In this regard, Applicant's undersigned attorney may be reached by phone in California (Pacific Standard Time) at (714) 708-6500. All correspondence should continue to be directed to the below-listed address.

The Commissioner is hereby authorized to charge any required fee in connection with the submission of this paper, any additional fees which may be required, now or in the future, or credit any overpayment to Account No. 50-2638. Please ensure that the Attorney Docket Number is referred when charging any payments or credits for this case.

Respectfully submitted,

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